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Kenai Limited Employee Benefit Plan*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

KENAI DRILLING LIMITED, a Delaware  
Corporation, and KENAI DRILLING LIMITED  
EMPLOYEE BENEFIT PLAN,

Case No.: 2:24-cv-01559-CDS-EJY

Plaintiffs,

vs.

SUN LIFE ASSURANCE COMPANY OF  
CANADA, a Delaware corporation,

Defendant.

**STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANT  
TO FILE RESPONSE TO AMENDED COMPLAINT (FIRST REQUEST)**

Pursuant to Local Rule IA 6-1 and IA 6-2, it is hereby stipulated between Plaintiffs, Kenai Drilling Limited and Kenai Drilling Limited Employee Benefit Plan (“Plaintiffs”), by and through their counsel of record, Marquis Aurbach, and Defendant Sun Life Assurance Company of Canada (“Sun Life”), by and through their counsel of record, Figari + Davenport, LLP and Weinberg, Wheeler, Hudgins, Gunn & Dial, LLC, that the deadline for Sun Life to file a response to Plaintiffs’ Amended Complaint be extended from May 6, 2025 to **June 20, 2025**.

1. Plaintiffs filed a Petition to Compel Defendant Sun Life to Arbitration in the Eighth Judicial District Court of Nevada, on July 24, 2024.

2. Sun Life filed a Petition for Removal of Action on August 23, 2024 [ECF No. 1].

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3. On September 16, 2024, Sun Life filed their Response to the Petition to Compel Arbitration [ECF No. 13].

4. Plaintiffs filed their Reply in Support of the Petition on October 11, 2024, including a request for leave to file an amended complaint against Sun Life [ECF No. 27].

5. On January 21, 2025, the Court issued an Order and Report and Recommendation as to the Petition to Compel, and granted Plaintiffs' motion for leave to file an amended complaint [ECF No. 33].

6. Plaintiffs filed an objection to the Court's Report and Recommendation on February 4, 2025 [ECF No. 34] and filed their First Amended Complaint on April 22, 2025 [ECF No. 37].

7. In light of the foregoing, the Parties have agreed to extend the deadline for Sun Life to file its response from May 6, 2025 to **June 20, 2025**.

8. This Stipulation is filed before Sun Life's response is due, is made in good faith, and is not sought for the purpose of unwarranted delay.

IT IS SO STIPULATED.

Dated this 5<sup>th</sup> day of May 2025.

**MARQUIS AURBACH**

/s/ Christian T. Balducci  
Christian T. Balducci, Esq.  
Nevada Bar No. 12688  
*Attorneys for Plaintiff*

Dated this 5<sup>th</sup> day of May 2025.

**FIGARI + DAVENPORT, LLP**

/s/ Lance V. Clack  
Bill E. Davidoff, Esq. (*Pro Hac Vice*)  
Lance V. Clack, Esq. (*Pro Hac Vice*)

**WEINBERG, WHEELER, HUDGINS,  
GUNN & DIAL, LLC**  
Ryan T. Gormley, Esq.  
Nevada Bar No. 13494  
*Attorneys for Defendant*

IT IS SO ORDERED.

  
U.S. MAGISTRATE JUDGE

Date: May 5, 2025